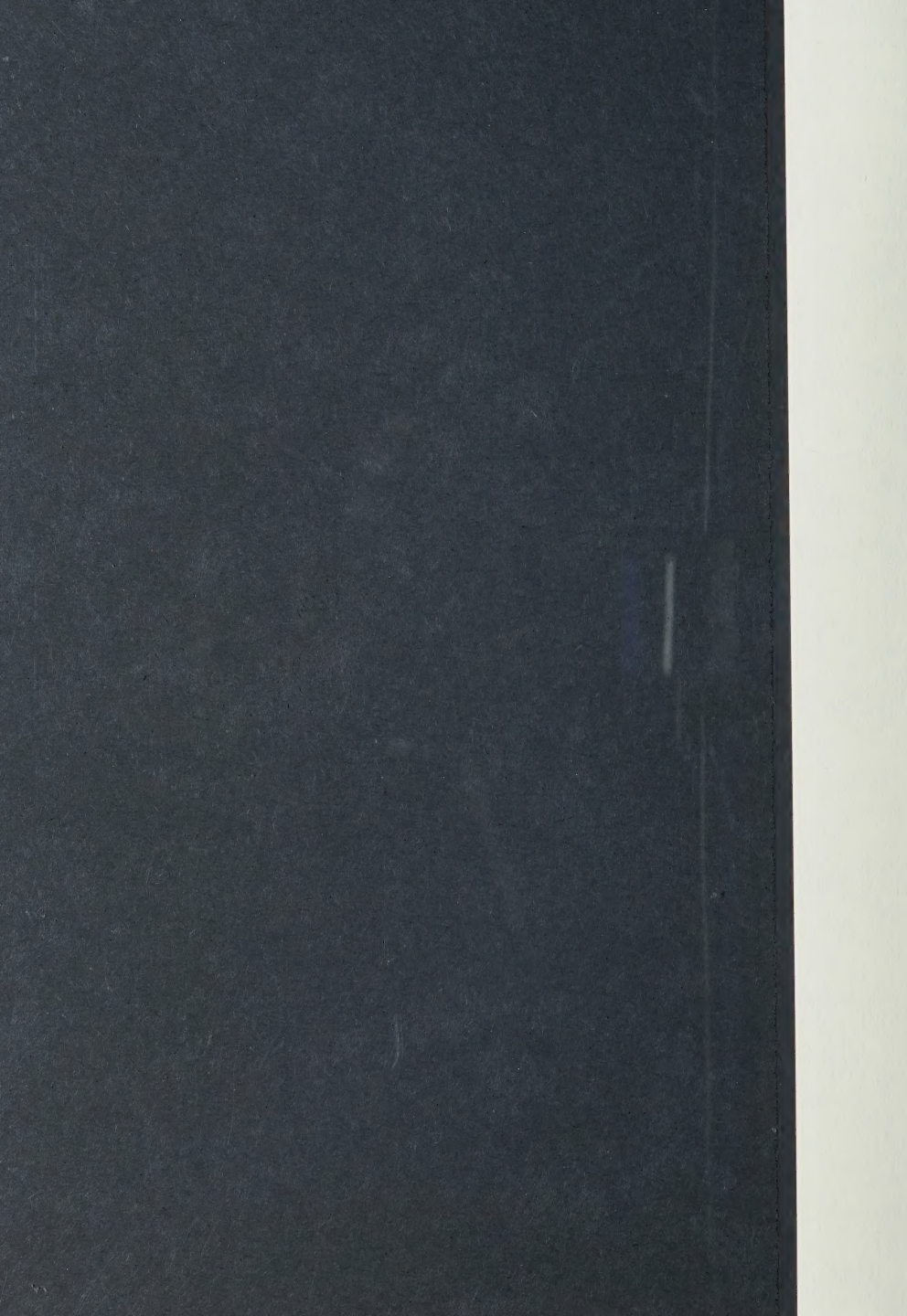


MINISTRY OF NATURAL RESOURCES

# Southern Ontario Co-ordinated Program Strategy

## SUMMARY OF PUBLIC RESPONSES








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# Southern Ontario Co-ordinated Program Strategy

## SUMMARY OF PUBLIC RESPONSES

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Ministry of  
Natural  
Resources

Hon. Alan W. Pope  
Minister  
W. T. Foster  
Deputy Minister

November 1981



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## I INTRODUCTION

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In southern Ontario, the purpose of the ministry's strategic land use planning program is to develop a co-ordinated program strategy for its activities. The strategy, when completed, will identify the land and water required to meet the ministry's objectives between now and the year 2000 to 2020. It will indicate generally how Natural Resources wishes to use or influence the use of this land and water to achieve these objectives. The strategy will be the basis for co-ordinating the ministry's land-using programs and will form a major part of the ministry's contribution to provincial, regional, and municipal planning.

The Co-ordinated Program Strategy also will provide the framework within which more detailed strategies can be prepared for each of the ministry's 21 administrative districts in southern Ontario. These district reports will describe where and generally how the ministry's objectives are to be met locally.

In April 1979, a report called **Proposed Policies: Co-ordinated Program Strategy for the Ministry of Natural Resources in Southern Ontario** was circulated for public discussion. The responses were summarized in a document called **Public Responses to the Proposed Policies Report**. The responses were used in preparing the draft **Co-ordinated Program Strategy for the Ministry of Natural Resources in Southern Ontario**. The Strategy was distributed in March 1981 for public discussion. This report highlights the results of the public circulation of the Strategy report.

The purpose in circulating the Co-ordinated Program Strategy discussion document was to determine the extent to which the material is a workable, accurate, and understandable expression of the ministry's intention for achieving its objectives in southern Ontario. The material is, in some areas substantially altered from that of the **Proposed Policies** report based on the public responses received and further technical analysis.

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The Co-ordinated Program Strategy report is being rewritten, with careful consideration being given the issues raised in the public comments. The Strategy then will be distributed.

Chapter II in this report identifies the groups and individuals who have been contacted during the participation process. Chapter III reviews how public comments on the Proposed Policies report were considered. Chapter IV provides an overview of the comments received on the Strategy report. The mailing list and respondents are included in the appendices.

The thoughtfulness and care taken by those reviewing the Strategy are an indication of the value of this type of consultation and, no doubt, will result in a more effective Strategy.



The initial mailing list for the **Proposed Policies** report included those groups and agencies who would likely be interested in dealing with the long term direction for Natural Resources' programs at a southern Ontario level. This was done bearing in mind that the report presented broad policies and that local or district planning would be a more appropriate forum in which to involve groups or individuals over local issues.

Additions to the initial list were made as individuals and groups became aware of the project and requested to be involved. The number on the list increased from 380 for the circulation of the **Proposed Policies** report to 435 for the **Co-ordinated Program Strategy**. The list is included as Appendix B. In addition, a further 500 copies of the report were distributed to ministry staff and provided as extra copies to those who requested them.

Appendix A is the original circulation letter for the **Strategy** report. The deadline was extended to the end of May. Comments received to the end of November were considered. Each response was individually acknowledged.

The list in Appendix B will continue as the basis for circulating **Co-ordinated Program Strategy** material.

Appendix C lists those who responded to the draft report.

There was a substantial volume of correspondence in response to the **Proposed Policies** report. This correspondence raised both general issues and questions related to individual programs. Technical comments were considered and the appropriate changes made. Matters of policy, philosophy, or presentation were discussed with the ministry's senior managers for southern Ontario and changes were proposed based on their conclusions. The acceptance of a comment was based on its apparent merit, not the number of times it was made.

Specific examples of recommendations that were adopted can be cited. A number of comments concerned the projected consumption of mineral aggregate. The ministry was advised to reconsider the projections in light of recent changes in the market. The result of this examination was a significant reduction in projected consumption. A current review has suggested a further reduction, based largely on an expected increase in the amount of material being recycled.

Not all comments could be accepted. In several instances it was recommended that the ministry give priority to one objective over another where both are achievable. The ministry's responsibility is to achieve all targets.

Some comments did not bear on Natural Resources' responsibilities. These could not be incorporated.

The public comments on the **Proposed Policies** resulted in substantial changes in both program direction and the manner in which ideas were expressed in the **Strategy**.

## A: numerical summary

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Fourteen percent of the recipients of the draft Co-ordinated Program Strategy provided comments. No attempt was made to increase this by reminder letters. The responses received are summarized in Table 1.

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TABLE 1    RESPONSE BY CATEGORY

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	Number Sent	Responses	
		Received	% Responding
Government Agencies	44	14	32
Municipalities	64	12	19
Conservation Authorities	35	13	37
Individuals	73	4	5
Special Interest Groups	94	18	19
Members of the Legislative Assembly	125	2	2
TOTAL	435	63	14

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Table 2 presents the geographical distribution of comments for municipalities, conservation authorities, and members of the Legislative Assembly.



TABLE 2    RESPONSE BY ADMINISTRATIVE REGION

	Administrative Region	Number Sent	Responses Received	% Responding
Municipalities	Algonquin	4	0	0
	Central	29	10	34
	Eastern	13	1	8
	Southwestern	18	1	6
Conservation Authorities	Algonquin	2	0	0
	Central	12	7	58
	Eastern	9	1	11
	Southwestern	12	5	42
Members of the Legislative Assembly	Algonquin	18	0	0
	Central	64	1	2
	Eastern	19	0	0
	Southwestern	24	1	4

## B: general summary

Support for the project was voiced by the majority of respondents.

The idea of improved co-ordination and long-term direction appealed to a number of respondents including the Bruce Trail Association who offered

. . . support and encouragement for the ministry's efforts in developing its Strategic Land Use Plan for Southern Ontario. It has been evident for years that a comprehensive Provincial Planning exercise of this level is long overdue and will contribute much when completed to the rationalization of competing demands for Provincial Resources.

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The Minister of Environment Canada found ". . . the strategic plan outlined in the document to be well-reasoned, comprehensive, and indicative of much preparatory work and discussions."

Not all correspondents provided such whole-hearted support. The Regional Municipality of Halton's Ecological and Environmental Advisory Committee said ". . . we commend the ministry for taking the strategic land planning approach . . . However, the present document is not suitable to provide a framework for strategic planning in southern Ontario."

The Canada-Ontario Rideau-Trent-Severn Secretariat noted:

The strategy does not cover any of the foreseeable problems in areas beyond the present ministry programs. In that sense it does not answer concerns of the people but only gives direction within existing programs. There is not even an illusion that the ministry is contemplating action beyond existing programs.

In general, there seemed to be overall support for the purpose of the document. There were, however, many suggestions for improvement and some criticism that the Strategy had not done what it purported to do.

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## c: issues raised

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### 1. CO-ORDINATION WITH OTHER AGENCIES

Probably the issue which was raised most repeatedly and most forcibly concerned the ministry's role in relation to other agencies and programs. Generally these comments identified the need for co-ordination, or expressed concerns about the possible impact of ministry policies or approaches on the programs of other agencies.

#### a. Conservation Authorities

The view of several conservation authorities is represented by St. Clair Region Conservation Authority:

From reviewing this document it would appear that Conservation Authorities are not considered a part of the Ministry of Natural Resources. The significant contribution of Conservation Authorities toward the

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implementation and administration of the Ministry's resource management program in Southern Ontario is not included in the preparation of targets and strategies in this document.

Not all authorities agreed. The Otonabee Region Conservation Authority said ". . . that the interests of conservation authorities are well represented."

More specifically, the authorities raised the following points:

The targets . . . are especially difficult to relate to the Conservation Authority interests and programs;

. . . a clearer distinction between our local roles and responsibilities should be established within the Provincial Co-ordinated Program Strategy to reduce confusion or misunderstanding as to who is doing what;

. . . the report appears to underestimate the ability of the Conservation Authorities to play a significant role in the delivery of these services to the general public . . . ;

. . . a moderate change in the role of the Ministry is suggested and how this change will affect the Authority is not alluded to.

b. Municipalities

Several municipalities commented that the southern Ontario Strategy or the district land use strategies might reduce their autonomy.

This position was presented by Puslinch Township:

Local municipalities must play a greater role in the process of establishing policies for the topics contained within your discussion paper so that their individual needs are not overlooked for the sake of a province-wide broad-brush objective.

The Regional Municipality of Peel expressed the view

. . . that the Regions/Counties and Area Municipalities are the appropriate levels of government to formulate land use plans and that the Ministry objectives and targets for resource management programs be implemented through Regional/County and Area Municipal Official Plans and not through local Ministry Resource Management Plans.

The view of many municipalities was similar to that of the Regional Municipality of Hamilton-Wentworth, which emphasized that the ministry should

. . . continue to directly involve the Region of Hamilton-Wentworth and the local municipalities affected, in the development of such policies and programs as will have an impact within their jurisdiction well in advance of their finalization.

c. Other Agencies

Although provincial and federal agencies that responded were generally



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satisfied with the Strategy, there were several suggestions for improvement related to co-ordination with other agencies. For example, the Ontario Ministry of the Environment suggested that ". . . some additional material could be added . . . which would list and describe the particular thematic areas where close liaisons between agencies will be important . . . "

Several interest groups also dealt with the question of inter-agency relations. The Conservation Council of Ontario would like to see ". . . specific guidelines which would govern potential conflicts which arise between different Ministries . . . " while the Ontario Federation of Agriculture stated it is essential that ". . . any program be prepared in consultation with affected ministries in order to arrive at an acceptable program."

d. Special Planning Areas

Comments were received about the relationship of the Strategy to two special planning areas--the Niagara Escarpment and the Rideau-Trent-Severn corridor.

The Coalition on the Niagara Escarpment said that the Strategy did not adequately deal with ". . . the way your ministry will work to co-ordinate the Government's existing policy on the Niagara Escarpment."

Similarly, the Canada-Ontario Rideau-Trent-Severn Secretariat found the Strategy did not ". . . attempt to interrelate your ministry's programs with those of any other federal or provincial agencies. Thus, the strategy is only co-ordinated in the sense of one agency 'getting its act together' around existing programs."

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## 2. INTEGRATION OF MINISTRY PROGRAMS

The topic of program integration was dealt with by reviewers in two ways. Most reviewers discussed integration in the context of the whole report, while some commented specifically on the integrated resource management policy. The former is dealt with here, the latter in section 3.

Two quotations can serve to indicate the range of general comments on program integration.

The Canadian Wildlife Federation favours and heartily supports the emphasis placed on co-ordination and integration with other programs, departments and jurisdictions that have a bearing on your objectives, particularly those with respect to fish and wildlife resources.

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The Regional Municipality of Niagara presented a different view:

. . . the production targets established by the strategy for each individual policy area may be achievable. The question is, however, are they achievable given the targets for each of the other policy areas. . . . At no place in the overall strategy is there a clear recognition of the inter-relationships of the topic areas. . . . In case of directly competing land uses . . . the strategy provides no guideline for how the more detailed district land use strategies which are to follow are to resolve these possible conflicts.

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### 3. GENERAL POLICIES AND STRATEGIES

In the Strategy report there are four general topics that serve to guide all ministry programs.

#### a. Integrated Resource Management

An example of the comments specific to integrated resource management is that of the Federation of Ontario Naturalists:

The emphasis on integrated resource management (formerly known as multiple use) could easily be interpreted as a public relations cover to allow resource exploitation in all areas.

#### b. Public Safety

This policy outlines the basis for the ministry's involvement in floodplain management, and safety around abandoned pits and quarries. It was the subject of a number of concerns.

The Long Point Region Conservation Authority asked for further clarification:

This policy is of course an extremely important one and one which has a high profile in the public's collective eye, particularly as it relates to flooding. As such, we feel this policy needs further clarification and elaboration to highlight the respective and co-operative roles of Ministry of Natural Resources and Conservation Authorities.

The Foundation for Aggregate Studies commented that the statements dealing with safety around abandoned pits, quarries, and mine shafts are not strong enough:

What is required is strong legislation to protect citizens from the hazards of abandoned pits and quarries, along with an allocation in the rehabilitation fund for immediate fencing or other precautionary measures of all abandoned pits in Ontario.

#### c. Environment

There seemed to be general support for this policy. As with the other general policies, though, the lack of specifics was noted. The Federation of Ontario Naturalists wrote:

While the environment objective is excellent, the specific activities that will be subject to environmental assessment or other safeguards such as design guidelines should be identified.

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The Conservation Council wondered ". . . what an 'acceptable environmental quality' might be for the people of Ontario and what in fact is meant by a 'satisfactory environment.'"

Several reviewers commented on the protection of rare and endangered species. For example, the Faculty of Environmental Studies, University of Waterloo noted: "There is not direct mention of policies relating to conservation of rare plant species (as opposed to wildlife) outside of Provincial Parks."

d. Energy

As might be expected with a topic of current public interest, there were many observations on the ministry's energy policy.

The increase in energy production of 478% from forest biomass should be reviewed in terms of potential ecologic and social effects.

Some passing reference has been made to the recognition of the need for future hydraulic power development. However, . . . I see no comment encouraging the private development or redevelopment of hydraulic power resources in Ontario.

The proposal to examine the energy potential of Ministry dams is excellent. This examination should also include dams owned and operated by Conservation Authorities.

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4. FORESTRY

The most prevalent theme among the responses which discussed forestry was concern over a perceived overemphasis on production forestry to the detriment of other forest values. The Federation of Ontario Naturalists stated that the forestry discussion should ". . . recognize that the first priority is protection of the resource base, and that harvest of the 'surplus' is a secondary benefit." The Regional Municipality of Niagara believes that the ". . . primary emphasis . . . is on the maximum possible harvest of marketable timber", and that this ". . . could possibly result in conflict with the other environmental benefits that a natural forest can provide such as wildlife habitat, groundwater recharge, recreation, and aesthetic appeal."

One specific strategy which raised environmental concerns was the proposal to introduce "rapid growing and short rotation species." The Sierra Club of Ontario had "serious reservations" about this because, "This type of 'agriforestry' does not produce many of the environmental benefits which are normally associated with forestry."



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The feasibility and/or desirability of target achievement was another major theme. The Conservation Council of Ontario stated:

This Council finds it difficult to appreciate how the annual target for wood production in Southern Ontario of 209 million cubic feet by 2020 can be met from a current harvest of 94 million cubic feet. This implies an extensive forest renewal and improvement program whose achievement we question in light of the present serious state of forest regeneration and when other competing demands for forestry benefits are on the increase.

The Regional Municipality of Halton noted: "The forestry targets may not be achievable in Halton due to the concern with protecting botanical and wildlife features of Environmentally Sensitive Areas."

On the other hand, the Sierra Club of Ontario noted that the target is not designed to meet the anticipated demand, and asked for clarification of why this was done, and what the implications are.

Other issues raised in the review were:

- . . . the supply of wood necessary to meet the energy biomass target could be quantified . . . ;

A role for municipalities should be provided for the protection and management of urban and rural woodlots within official plans and development policies;

Some clarification of the role of Conservation Authorities in achieving forestry objectives is needed;

- . . . the Ministry needs a strong policy statement which provides for realistic tax incentives and which provides moneys to cover a substantial portion of the cost of conducting studies, inventories and management plans, through the private sector;

- . . . we recommend that forestry policies include reference to protective measures such as tree-cutting by-laws and provision for environmental assessment of intensive forest management practices;

There is no indication of the economic incentives to private landowners and the forest industry which are needed to achieve this [2020] target.

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## 5. MINERAL AGGREGATES

The mineral aggregates section of the Strategy received the greatest number of specific comments.

There was general agreement among the respondents that the lower estimates of projected consumption of mineral aggregates were more realistic. However, there were still doubts about the assumptions regarding growth

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rates of 1 1/2 percent per annum to 2000 and 2 percent in the period 2000-2025. The Regional Municipality of Niagara noted:

The projected annual growth of 2% past the turn of the century does warrant closer examination. On what basis was the increased rate of aggregate production predicted and how valid is any production target such as this for a period beyond 20 years?

Several municipalities restated concerns which they had made previously in connection with the **Proposed Policies** report. In particular, the belief was expressed that the targets suggested that the ministry is seeking to establish a quota for supply from municipalities. The Regional Municipality of Waterloo said that, "The use of a quota system would compromise other objectives such as protection to residential communities and conservation of natural resources." Their submission also stated that there was a need to establish a more responsible role for the municipalities. This view was supported by the Regional Municipality of Peel's comment that, "Clear reference is still not made regarding the involvement of municipalities in ensuring the supply of mineral aggregates to meet local, regional and provincial needs."

A number of responses dealt with a perceived lack of emphasis on environmental protection and conservation. Three concerns which were raised are summarized in the following comments:

. . . the new draft strategy does not sufficiently address the well known problems and concerns with open pit extraction techniques and the difficulties with mitigating their impacts;

. . . there is no mention of the conflict between aggregate extraction and agricultural land--or social and environmentally sensitive areas;

The conservation of sand, gravel, stone (and shale) has not been included in the implementing strategies for mineral aggregates; staff feel this should be included.

Not all submissions were critical of the direction outlined. The Ready Mixed Concrete Association of Ontario noted:

. . . it is encouraging that the Provincial Government has seen fit to take steps for the protection of this non-renewable natural resource.

. . . The Province is the only agency that can properly assess the importance of this provincial natural resource and, as such, its decision must prevail.

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Other comments were:

Mineral Aggregates seem to exclude shale. We feel it should be defined as in the new Aggregates Act;

We endorse the moves to revise targets . . . and especially the fledgling reference to investigating means of reducing demand through recycling or substitutes;

. . . Ministry of Natural Resources should encourage the use of wayside pits as a way of recovering resources not normally of commercial significance, so that rehabilitation can take place and land can be made available for other uses.

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## 6. MINERALS AND FOSSIL FUELS

Many of the issues which were raised concerning mineral aggregates, for example, environmental protection, need for conservation, and the role of municipalities were also raised in the review of the minerals and fossil fuels section.

The Regional Municipality of Peel recommended that, "An objective should be to improve or protect the environment from degradation, protect local residents, and accommodate other land use activities."

Further environmental concerns were raised by the Conservation Council of Ontario:

Although we note that the Strategy specifies that the full mineral potential of land in some regions ought to be established before the option to mine is foreclosed, we are of the opinion that there are some areas where no such activity should ever be allowed.

We are particularly apprehensive that any push to open up the Great Lakes for oil and gas production augurs further deterioration in the already poor state of health of the water in the Lakes.

The issue of conservation was raised by the Regional Municipality of Peel with the suggestion that, ". . . the conservation of minerals and fossil fuels should be included in the implementing strategies for the minerals and fossil fuels management programs."

Serious concerns were expressed by the Regional Municipality of Waterloo about the apparent lack of involvement of municipalities in decisions regarding mining:

Municipalities are to be encouraged to support mineral exploration and extraction, yet there is no frame of reference for a municipal decision. The strategy implies that if there is short-term economic potential then municipalities should accept this activity.

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The existing target for Mineral Resources, "to keep open as much land as possible for mineral exploration and development" was described by the Sierra Club of Ontario as being ". . . simply not helpful in providing any guidance."

The lack of specific targets for mineral production also was raised by both the Ontario Mining Association and Ontario Hydro. The Ontario Mining Association stated that ". . . we believe that the setting of goals, objectives, and strategies for mineral production is as important as for sport fishing, fur trapping, and picnicking to give but a few examples." ". . . The lack of targets for anything other than fuels is disappointing," was Ontario Hydro's comment.

A shortcoming noted by the Ontario Mining Association was that the Strategy did not clearly outline the significance to the southern Ontario economy of industrial minerals.

Other comments were:

. . . no specific consideration is given by this document to the issue of peat extraction in southern Ontario;

The ministry intends to allow the industry to mine and produce as the market demands. This is clearly short-term thinking and does not reflect the purpose of the ministry objective of a long-term strategy.

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## 7. FISHERIES

Comments regarding the fisheries section ranged from the congratulatory to the critical.

The Federation of Ontario Naturalists stated:

Again, this section is one of the best, and its concepts should be required reading for Ministry foresters. Not only do the fisheries policies recognize the principles of sustained yield and a finite resource, but they also 'bite the bullet' on the tough questions of allocation and reduced levels of harvest in future. We also endorse the reference to provincially rare and endangered fishes, although the proposed implementation of this objective is weak.

The Ontario Council of Commercial Fisheries, on the other hand, was "very concerned" about the fisheries policies, and noted that the commercial fisheries target represents ". . . a tremendous drop which the Council strongly opposes."



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A major fisheries issue was the targets.

The Regional Municipality of Waterloo observed that "These are the weakest targets and the paper admits that there could be serious problems in achieving these targets."

The Ontario Federation of Anglers and Hunters noted:

The target for sport fishing, as measured in pounds or kilograms, is much too low.

The increased weight of the angling harvest from 1980 to 1999 is projected to be a mere 2.5%. Anglers are already dissatisfied with their catches in southern Ontario. Substantial supplementary stocking must be undertaken and the targets must be increased or the current rumblings of dissatisfaction will be transformed into a mighty roar.

The Ontario Council of Commercial Fisheries reviewed the targets and expressed strong concern, particularly in connection with Southwestern and Eastern regions:

The proposed cutback from the Southwest Region is devastating, particularly when considering this region includes the areas of the Great Lakes from which the majority of fresh water fish are harvested;

What is proposed for the Eastern Region can only be described as tragic. According to your figures they are to be cut back to 77% of their 1979 catch. From the 1981 quotas they have been given (or actually NOT given) there won't be a commercial fishery in 1999.

The Fisheries Council of Canada was ". . . concerned about your projections for future sustained levels of commercial catches."

A second major issue was the proposed allocation of 25 percent of Ontario's share of Great Lakes production to the sport fishery, and the stated policy of favouring angling over commercial harvest.

The Fisheries Council of Canada was ". . . concerned that the government's policy would favour angling over commercial fishing where there is competition between the two."

The Ontario Federation of Anglers and Hunters responded:

Where recreation and commercial use of fisheries resources are in competition, angling should always be favoured. . . .

The commercial fishing harvest should be limited to nonsport species in the Great Lakes.

. . . 75% of the Great Lakes harvest must not arbitrarily be slated for commercial fishermen.

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A third issue which was raised was the problem of contamination of fish.

Comments included:

The harvest projections for the Ontario fishery have diminished meaning when related to the real issue of the harvest not being fit for human consumption;

We are concerned about the continuing discharge of industrial chemicals to the Great Lakes. . . . the problem . . . requires nothing less than a critical plan for eliminating the discharges of industrial chemicals from Canadian and American sources.

Other comments were:

It is clear to us that enhancement of native species should be a part of the strategy of the Province. Successful enhancement would eliminate the need to consider reductions in the commercial catch and could, in fact, provide for growth in that catch;

Although the implementing strategies . . . includes the co-ordinated efforts of the Ministry, Conservation Authorities, Municipalities, and other agencies staff feel that the roles of each in providing and implementing sport fisheries and wildlife recreation opportunities should be more clearly articulated.

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#### 8. WILDLIFE

One of the major issues raised by reviewers was the balance between hunting and viewing. Several reviewers believed that there was inadequate emphasis on wildlife viewing and protection. The Sierra Club of Ontario noted:

The wildlife section still seems to be primarily oriented to the production of 'cannon fodder'. This is in spite of the dramatic declines in hunting which the report notes, and the widely recognized increase in interest in non-consumptive uses (viewing, photography, etc.). This continuing imbalance should be corrected.

In a similar vein, the Federation of Ontario Naturalists stated:

The wildlife section has been generally improved by the adoption of lower and more realistic targets. However, the target to encourage non-consumptive wildlife activities is still too low.

Ontario Hydro also noted:

The emphasis once again seems to be on hunting and fur rather than the management, viewing, and rare and endangered species aspects.

Some reviewers did not share this perspective. The submission from the Regional Municipality of Waterloo commented:

This appears to be a well-developed and balanced strategy which considers the habitat of wildlife and allows people to hunt, for sport or for fur production, with reason. The strategy provides opportunities for recreation, when it is desired, however, the strategy establishes a protectionist attitude as well. There is no evidence that rampant hunting will be encouraged.

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The Ministry is clearly interested in working with municipalities, urban and rural, and conservation authorities to understand how to achieve these objectives.

There were also a number of comments related to the lack of emphasis on the protection of rare and endangered species. The Conservation Council of Ontario observed:

This section points out dramatically what we find to be a difficult conflict between, for example, maximizing economic benefits from wildlife recreation on the one hand and identifying and protecting rare and endangered species on the other. We again sense that undue emphasis lies with the former.

The Federation of Ontario Naturalists stated that "Protection of endangered species should not be lumped under 'wildlife recreation', which denigrates an important function and a cardinal ecological responsibility." The Federation also requested that there be "Some clarification as to whether 'wildlife' includes wild plants (as under the Endangered Species Act)."

Other comments were:

We disagree with your reference to 'decreased interest in' small game and waterfowl hunting. If you cannot satisfactorily justify that statement to us, please remove it from your document;

The 'thousands of pelts' table [on p.41] is meaningless, both biologically and economically. It should be possible to identify major species, e.g., beaver and muskrat, accounting for the majority of the pelts and the value.

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## 9. PROVINCIAL PARKS

This topic is always the subject of close scrutiny. There was general agreement that the proposed parks system, as defined, was acceptable. The major complaint was that our definition was not detailed enough. The Federation of Ontario Naturalists said:

Partly as a result of this lack of specificity, the CPS document is confusing on the number of new wilderness parks being proposed. Table 2 suggests a total future representation of 2 site regions (1 incomplete) but the target for Protection/Heritage Appreciation on page 43 lists only 1 wilderness park. Which it is, and where? . . . Finally, specific targets for nature reserves should be included. We are increasingly frustrated at the failure of parks planners to bring forward specific recommendations for the implementation of the 1978 Provincial Park Planning and Management Policies. Nowhere is this more apparent than in the area of nature reserves. It is simply not good enough to list nature reserve targets as 'unknown'.

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The Regional Municipality of Waterloo said:

The targets are the least comprehensible and cannot be easily translated into specific numbers or locations. The targets are expressed as representations of 47 districts and regions in Southern Ontario.

The Sierra Club also raised the issue of lack of specificity:

In view of the Sierra Club's long-standing concern for protection of wilderness, the most serious concern that the Club has regarding the CPS document is its ambiguity in the Parks Strategy regarding the number of Parks to actually result, and where even in approximate terms they would be located. . . . The CPS document should explicitly outline the wilderness options since this is an issue of provincial significance, not one that should be left to individual district land use strategies.

Why is there no mapping provided for the Parks section? Parks targets can never be adequately explained without maps. In other parts of the document it is our understanding that the targets represent commitments to be achieved over a period of years. But in the case of Parks, it appears unlikely that this is what is being promised. We suspect, for example, that the Ministry is not serious about its stated intention to establish one waterway class park in each site district. The Ministry's real intentions should be outlined in the CPS document.

The submission from the Ontario Ministry of Culture and Recreation commented:

. . . we have noted in the policy objectives for Provincial Parks that the targets are decidedly passive compared to the resource development and management targets for other Ministry of Natural Resources' programs. In our view, a more aggressive set of targets for provincial park development and management are desirable, particularly with respect to the conservation and interpretation of man-made heritage through the establishment of Historical Parks. There is currently only one historical park in southern Ontario.

There were comments about the commitment to provincial parks:

We are apprehensive that a growing requirement for day use activity in Parks will create pressure to convert areas set aside for nature reserves or other sensitive uses to this kind of very intensive use. This must be resisted by the Ministry. We urge that every effort be made by the government to commit itself to its own Provincial Parks policy and to back that up with the financial resources necessary both to manage existing Parks adequately and to establish new parks and reserves;

The park section talks of rationalizing the Provincial Park System to ensure development and retention of only those parks that merit provincial designation. Is this a suggestion to do away with part of the Provincial Park System where it may conflict with private campgrounds?

Co-ordination with other agencies also was questioned:

Staff feel it is important to articulate more clearly the integration of provincial parks with other parks systems in providing recreation opportunities or to balance the number, accessibility and functions of Provincial Parks with those of other open space and recreational resources. To this end, the target outlined above should be included as a



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target in the restructured Provincial Parks Program. Reference to these other agencies, in complementing future provincial parks, should then be included in the implementing strategies for the Provincial Parks Program;

The Strategy report does not address the role of Conservation Authority areas and recreational facilities in achieving provincial or ministry recreation objectives.

Several reviewers commented on the lack of mention of near-urban parks.

For example, the Regional Municipality of Waterloo noted:

There is nothing included in this strategy to judge the value of providing near-urban parks which are accessible to a majority of the population of Southern Ontario. . . . The Ministry is the best agency to provide these parks, particularly in the near-urban areas where travel costs can be reduced and energy saved.

The Faculty of Environmental Studies at the University of Waterloo recommended:

. . . the Ministry should establish the parameters for locating provincial parks in near-urban areas to serve the majority of the population in Southern Ontario.

Other comments were:

The objectives and targets for the provincial parks system (pp 23-25) present a clear opportunity for developing the concept of encouraging the development of the Bruce Trail (and other hiking trails) as one means of linking the Parks--making them a true network or system. Unfortunately, I do not see this precise concept being actively pursued in this document, although the groundwork is there;

The strategy strongly emphasizes swimming, picnicking, back country recreation and camping which appeal predominately to the 20's to 40's age groups. . . . it would seem desirable that we develop day use activities and amenities appropriate to the needs of the older age groups in some of the parks close to southern Ontario's population centres.

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## 10. GENERAL RECREATION

Most of the reviewers generally supported the intent of this section, and criticism was primarily directed at perceived omissions.

Several responses expressed disappointment about the lack of targets. The Federation of Ontario Naturalists stated:

In view of the importance of recreation outside parks, its compatibility with the multiple-use philosophy, and the comments received on the earlier draft of CPS we cannot understand why no targets have been established for general recreation.

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Criticism of the general recreation policy centered on the fact that the discussion ". . . fails to identify who will take the lead role in developing this needed co-ordinated policy." One agency, the Regional Municipality of Waterloo, expressed doubts about this comprehensive approach because "There is no evidence or past experience that all of the jurisdictions responsible for recreation in Southern Ontario can be brought together and integrated. . . ." The future role of conservation authorities in recreation was raised in several comments. Two specific concerns were that the document did not adequately reflect the authorities' significant role in providing recreation opportunities, and that the strategy outlined for co-operating with and providing assistance to conservation authorities and other agencies in the provision of outdoor recreation did not seem to be reflected in current ministry policy.

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#### 11. OTHER ISSUES

A number of issues were raised which did not fit into any of the categories already reviewed. This section briefly summarizes the most significant of these comments.

One of the most frequently made comments was the desire to be involved in the preparation of district land use strategies. The reviewers, particularly those with local concerns, saw the district strategies as the level where the significant tradeoffs will be made, and where the feasibility of implementing the Co-ordinated Program Strategy policies will be tested. A typical comment was, "The Authority accepts the Co-ordinated Program Strategy as reported under the assumption that it will be involved in the preparation of the more detailed local land use strategies."

The Conservation Council noted that the ministry will need to oversee the district strategies in order to avoid overlap and to ensure consistency.

The Council recommended:

- . . . that the Ministry revive the Advisory Committees available to it under the Public Lands Act to perform part of this regional and district coordination and to ensure that the public and its views are represented.

The staff of the Canada-Ontario Rideau-Trent-Severn Secretariat commented:

- . . . the strategy does not attempt to identify any potential programs or enlarged mandate that may be desirable or necessary to resolve current problems.

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The Federation of Ontario Naturalists suggested that there was a "missing element":

Since much of the MNR activity in southern Ontario relates to private land, one important element is missing from this CPS document. The policy should deal with the Ministry's role in protecting natural areas of provincial or regional significance through processes other than acquisition.

Professor P. Keddy of the University of Guelph commented on the quantification of targets:

Your appendices list production in terms of units of wood, minerals, hunting opportunities, etc. I think this should be excluded from the report. Conservation of representative communities, for example, cannot be adequately assessed in this manner. Many urban dwellers value wilderness even if they are not regular visitors. By emphasizing units of production, the report implies that those aspects not easily measured in production units are less valuable. In fact, production data alone would be a poor measure of the success of SLUP. Reduced confrontations with the public, conservation of communities, increased recreational experiences, planned development, interagency co-operation--these sorts of goals cannot be easily measured, but are nonetheless worth striving for.

In contrast, the Sierra Club of Ontario stated:

The summary table in Appendix B is potentially very useful. Unfortunately, its value is greatly reduced by the variety of base years and target dates, the incomplete data, and the failure to include the per annum increase. These shortcomings should be rectified.

The Conservation Council of Ontario raised the very broad issue of a "conservation philosophy". They wrote:

. . . a reading of the details of specific program strategies gives us an uneasy impression that the emphasis lies on development rather than on conservation. It is on this point that we wrote to the Ministry in August of 1979 stressing that the Council advocates the need for, and indeed sees no alternative to, a change in our basic lifestyle to meet "conserver society" objectives. One of these objectives is a realistic per capita consumption of raw materials which recognizes the finite limits of those resources. We believe that a downward adjustment in the amount each of us consumes must become a reality.

## A: distribution letter

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January 30, 1981

Some months ago you received a copy of *Proposed Policies: Co-ordinated Program Strategy*. Based on the thoughtful comments received and further technical analysis, we have prepared the attached report: *Co-ordinated Program Strategy for the Ministry of Natural Resources in Southern Ontario*. The *Strategy* states what the Ministry plans to achieve in southern Ontario. Objectives, targets and implementation strategies are identified. These will serve as the basis for co-ordinating and integrating the land-using programs of the Ministry.

The topics of water management and conservation authorities are not separately addressed in the *Strategy*. Rather, we have chosen to include references in all appropriate sections of the report, for example, public safety. We think this is the most satisfactory way of describing these important matters in this report.

Detailed strategies are being prepared for each administrative district. These will take into account local circumstances not possible to consider in a southern Ontario-wide document. The sum of these local strategies may well result in adjustments to the *Co-ordinated Program Strategy*.

The *Strategy* addresses the concerns expressed by those members of the public who examined the previous document. Your comments on the *Co-ordinated Program Strategy* would be appreciated before the report is finalized. Please respond to:

R. M. Dixon  
Acting Assistant Deputy Minister of Southern Ontario  
Maple, Ontario LOJ 1E0

by April 30, 1981.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'James Auld', with a large, stylized loop at the end.  
James A. C. Auld



April 30, 1981

Recently you received a copy of the report *Co-ordinated Program Strategy for the Ministry of Natural Resources in Southern Ontario* sent by my predecessor, James Auld.

The letter which accompanied the *Strategy* asked that you send your comments to R. M. Dixon, Acting Assistant Deputy Minister of Southern Ontario by April 30.

I would like to extend the date for comment to May 29 to ensure that everyone has had adequate time to review the *Strategy*. If you require a further extension please advise Mr. Dixon as soon as possible.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Alan W. Pope".

Alan W. Pope  
Minister

---

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Clerk-Treasurer  
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LOB 1N0

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R.R. #2  
Keene, Ontario  
KOL 2G0

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Six Nations Band  
Oshweken, Ontario  
NOA 1M0

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Sutton West, Ontario  
LOE 1R0

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LOK 1C0

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R.R. #1  
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NON 1J0

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General Manager  
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The Lower Trent River  
Conservation Authority  
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L0S 1E0

Chairman  
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Conservation Authority  
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Angus, Ontario  
L0M 1B0

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Resource Manager  
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Conservation Authority  
R.R. #1  
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L0M 1B0

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